

CAMPAIGN FINANCE DIVISION

☒ WAIVER REQUEST
☐ RECONSIDERATION REQUEST

DATE: 10/21/2020
DOCKET #:

FILER INFORMATION

Name: International Paper PAC
Office:
Parish:
Election Date: 10/12/2019
Level of Office: PAC

REPORT INFORMATION

Name of Report: 10-P
Original Due Date: 10/2/2019
Date Filed: 1/30/2020
Activity Receipts: \$595,105.67
Expenditures: \$668,809.56
Funds at Close of Reporting Period: \$ 141,474.25

LATE FEE INFORMATION

Amount of Late Fee: \$3,000
Days Late: 120
Late Fee Order Received: 9/1/2020
Payment/Waiver Request Due Date: 9/21/2020
Waiver Request Received: 9/2/2020
Additional Information Requested:
- Medical
- Financial
- Other

COMMENTS: Their compliance specialist spoke to Ethics representative and informed her that of a Federal PAC that they wanted to contribute more than \$20,000 to state level candidates and if these checks would trigger reporting obligations and that the Ethics representative advised that they would not have file report because the PAC received less than 50% of its total receipts from residence in LA., and disbursed the checks. In January of 2020, the PAC received a letter that outlined registration guidelines for the upcoming year. This letter raised questions about the PAC's 2019 contributions had, in fact, triggered registration and reporting requirements. As a result, they called the Ethics to confirm the previous information given remained accurate. They spoke with different Ethics representative which informed them that as soon as the PAC spends more than \$20,000, reporting is required.

OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: No
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No

CAMPAIGN FINANCE DIVISION

☒ WAIVER REQUEST
☐ RECONSIDERATION REQUEST

DATE: 10/21/2020
DOCKET #:

FILER INFORMATION

Name: International Paper PAC
Office:
Parish:
Election Date: 10/12/2019
Level of Office: PAC

REPORT INFORMATION

Name of Report: 40-G
Original Due Date: 12/27/2019
Date Filed: 1/30/2020
Activity Receipts: \$ 130,909.35
Expenditures: \$ 199,000.00
Funds at Close of Reporting Period: \$ 81,062.38

LATE FEE INFORMATION

Amount of Late Fee: \$3,000
Days Late: 34
Late Fee Order Received: 9/1/2020
Payment/Waiver Request Due Date: 9/21/2020
Waiver Request Received: 9/2/2020
Additional Information Requested:
- Medical
- Financial
- Other

COMMENTS: Their compliance specialist spoke to Ethics representative and informed her that of a Federal PAC that they wanted to contribute more than \$20,000 to state level candidates and if these checks would trigger reporting obligations and that the Ethics representative advised that they would not have file report because the PAC received less than 50% of its total receipts from residence in LA., and disbursed the checks. In January of 2020, the PAC received a letter that outlined registration guidelines for the upcoming year. This letter raised questions about the PAC's 2019 contributions had, in fact, triggered registration and reporting requirements. As a result, they called the Ethics to confirm the previous information given remained accurate. They spoke with different Ethics representative which informed them that as soon as the PAC spends more than \$20,000, reporting is required

OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: No
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No

CAMPAIGN FINANCE DIVISION

☒ **WAIVER REQUEST**
☐ **RECONSIDERATION REQUEST**

DATE: 10/21/2020
DOCKET #:

FILER INFORMATION

Name: International Paper PAC
Office:
Parish:
Election Date: 10/12/2019
Level of Office: PAC

REPORT INFORMATION

Name of Report: 10-G
Original Due Date: 11/6/2019
Date Filed: 1/30/2020
Activity Receipts: \$ 69,329.17
Expenditures: \$ 67,000.00
Funds at Close of Reporting Period: \$ 149,153.03

LATE FEE INFORMATION

Amount of Late Fee: \$3,000
Days Late: 85
Late Fee Order Received: 9/1/2020
Payment/Waiver Request Due Date: 9/21/2020
Waiver Request Received: 9/2/2020
Additional Information Requested:

- Medical
- Financial
- Other

COMMENTS: Their compliance specialist spoke to Ethics representative and informed her that of a Federal PAC that they wanted to contribute more than \$20,000 to state level candidates and if these checks would trigger reporting obligations and that the Ethics representative advised that they would not have file report because the PAC received less than 50% of its total receipts from residence in LA., and disbursed the checks. In January of 2020, the PAC received a letter that outlined registration guidelines for the upcoming year. This letter raised questions about the PAC's 2019 contributions had, in fact, triggered registration and reporting requirements. As a result, they called the Ethics to confirm the previous information given remained accurate. They spoke with different Ethics representative which informed them that as soon as the PAC spends more than \$20,000, reporting is required.

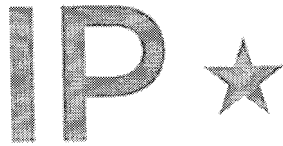
OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: No
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No



September 2, 2020

Louisiana Board of Ethics
PO Box 4368
Baton Rouge, LA 70821

To Whom It May Concern,

The International Paper PAC ("the PAC") submits this waiver request in response to the following letters: 1) An April 13, 2020 letter received on May 7, 2020, in regards to the late filing fee assessment for the 30 Day Prior to Primary report reflecting activity for the period covering January 1, 2019 through September 2, 2019; 2) April 6 and April 13 letters, received on July 30 via email with respect to the 2019 10th Day Prior to Primary and 10th Day Prior to General reports. (See footnote 1 below); and 3) A July 30, 2020 letter received via email with respect to the 40th Day after General 2019 report which was sent after approved by the Board on July 30.

As background, the original waiver request submitted on May 13, 2020, only addressed the untimely filing of the 30th Day Prior to Primary report as that was the only letter I had received at that time. On July 27, 2020, the PAC's compliance vendor reached out to the Louisiana Board of Ethics to request an update on the status of the waiver request for the 30th Day Prior to Primary report. It was during this email exchange, Angela Newsom, Louisiana Board of Ethics, notified the PAC's compliance vendor of the additional late filing fee assessment notices for the 10th Day Prior to Primary, 10th Day Prior to General and 40th Day after General 2019 reports.

Due to Covid-19, the employees of International Paper are unable to return to the office on a regular basis. On July 30, 2020, while the PAC's Administrator was in the office, the PAC confirmed the envelope did not include the additional notices referencing the untimely filed reports, 10th Day Prior to Primary or, 10th Day Prior to General as indicated by the State¹.

Ms. Newsom advised the PAC to submit a second waiver request referencing all four untimely filed reports, which will be reviewed by the Board during the September 2020 meeting (which I now

¹ The State sent two envelopes to International Paper PAC by certified mail in April. One envelope was addressed to me, Meaghan Joyce. Our office was closed in March due to Covid-19 and staff have been to the office infrequently since that time. The state has graciously provided the certified mail receipts to us. The certified mail receipt for the envelope addressed to me was signed by an unknown "Agent" with a CV-19 designation. That individual is not an International Paper employee. While that envelope was delivered to International Paper's office, unfortunately it had only one notice letter in it to which I previously responded. It did not include the letters referencing the 2019 10th Day Prior to Primary and 10th Day Prior to General reports. In reviewing our records, we have found that the second envelope addressed to Chris Keuleman, signed by the same unknown Agent, was also delivered. The letter in Mr. Keuleman's envelope apparently related to the 10th Day Prior to the Primary.

ETHICS BOARD REC'D
SEP 2 '20 AM 10:30

International Paper Political Action Committee (IP-PAC)
1101 Pennsylvania Ave, NW, Suite 200 | Washington, DC 20004

Finally, International Paper is a Federal PAC that is registered and files monthly reports with the Federal Election Commission. All state level checks, including the contributions at issue here to Louisiana committees, were disclosed on its monthly federal reports. There was no intent in delaying the disclosure of these contributions. As such, we formally request the penalty and late notice for each of these reports receive a waiver from the Board of Ethics.

Please feel free to reach out to me at Meaghan.joyce@ipaper.com or 202-628-1321 if you have any additional questions or concerns.

Sincerely,

A handwritten signature in cursive script, reading "Meghan K. Joyce".

Meaghan Killion Joyce
Treasurer

Melissa Horn

From: Meaghan K Joyce <meaghan.joyce@ipaper.com>
Sent: Wednesday, September 2, 2020 9:11 AM
To: Melissa Horn; Joe Catania (DDC)
Cc: Colleen Zelenakas (DDC); Brenda Jones; Chris J Keuleman
Subject: RE: International Paper Late Filing Notices
Attachments: International Paper PAC Final Waiver Request_Sept 2.docx

Categories: Waiver/Reconsideration

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

International Paper-Business Use [YELLOW]

Good morning Melissa,

Please accept the attached final waiver letter in reference to International Paper PAC's 2019 reports: 30 Day Prior to Primary report, 10th Day Prior to Primary, 10th Day Prior to General and 40th Day after General. Please contact me with any questions.

Meaghan

Meaghan K. Joyce

Senior Manager, Political & Advocacy Strategy | Global Government Relations

International Paper Company

P: (202) 628-1321

From: Melissa Horn <Melissa.Horn@la.gov>

Sent: Wednesday, September 2, 2020 9:40 AM

To: Meaghan K Joyce <meaghan.joyce@ipaper.com>; Joe Catania (DDC) <JCatania@ddcpublicaffairs.com>

Cc: Colleen Zelenakas (DDC) <CZelenakas@ddcpublicaffairs.com>; Brenda Jones <Brenda.Jones@ipaper.com>

Subject: [External] : RE: International Paper Late Filing Notices

You can submit waiver by e-mail to me or fax.

Thank you,

Melissa Horn

Program Compliance Officer

Louisiana Board of Ethics

P. O. Box 4368, Baton Rouge, LA 70821

Phone: (225) 219-5618 Toll Free:(800) 842-6630

(225) 381-7271 (facsimile)

Melissa.Horn@la.gov

From: Meaghan K Joyce [<mailto:meaghan.joyce@ipaper.com>]

Sent: Tuesday, September 1, 2020 2:36 PM